UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

PC Code: 128847
DP Barcodes: 402993, 404403
Date: August 29, 2012
DECISION: 461527

MEMORANDUM

Subject: Ecological Risk Assessment for the Proposed New Use of Difenoconazole as a Seed Treatment for Potatoes

To: Rosemary Kearns, Risk Manager Reviewer
Tony Kish, Risk Manager
Registration Division (7505P)

From: Anita Ullagaddi, Biologist 8/29/12
Christopher M. Koper, Chemist
Nancy Andrews, Branch Chief 8/29/12
Environmental Risk Branch I
Environmental Fate and Effects Division (7507P)

Syngenta Crop Protection submitted a Section 3 new use request to register the formulated seed treatment product CruiserMaxx Potato Extreme on potato tubers. CruiserMaxx Potato Extreme contains the following three active ingredients: difenoconazole (10.27%), thiamethoxam (20.83%), and fludioxonil (5.21%).

Fludioxonil (PC code 071503) resides in a different Environmental Risk Branch, and the Environmental Fate and Effects Division (EFED) defers to the Registration Division (RD) to determine the ecological risk assessment requirements for registration of this chemical.

An ecological risk assessment is not necessary for thiamethoxam (PC code 060109) because another product, CruiserMaxx Potato, which contains thiamethoxam and fludioxonil, has already been registered for use on potato tubers at the same application rate (0.125 lb thiamethoxam/acre).

For difenoconazole (PC code 128847), the proposed registration of CruiserMaxx Potato Extreme on potato tubers would result in a field loading rate of 0.06188 lb difenoconazole/acre. While this rate has not been assessed for a seed treatment use (and EFED's assessments are crop-specific and application method-specific), difenoconazole has been registered as a foliar spray at a maximum single rate of 0.11 lb difenoconazole/acre and a maximum seasonal rate not to exceed 0.46 lb difenoconazole/acre (formulated products Inspire and QuadrisTop). Because fungicide seed treatments generally result in less environmental exposure (due to burying of the treated seed and lack of spray drift), an ecological risk assessment is not needed, as the previous foliar spray assessments (DP333319 and 340041; July 12, 2007), which were not used as justification to deny registration, would be protective of this proposed lower rate seed treatment use.

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